

1 KEVIN V. RYAN (CASBN 118321)  
2 United States Attorney

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RICHARD J. ...  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
WILLIAM JIN and PERRY ZHENG, )  
Defendant. )

No. CR 02-20046 RMW

VIOLATIONS: 18 U.S.C. § 2320(a) –  
Trafficking in Counterfeit Goods; 18 U.S.C.  
§ 981(a)(1)(C), 28 U.S.C. § 2461(c) –  
Criminal Forfeiture

SAN JOSE VENUE

SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 2320(a) – Trafficking in Counterfeit Goods)

On or about March 31, 2000, in the Northern District of California, and elsewhere, the  
defendants

WILLIAM JIN and PERRY ZHENG,  
did intentionally traffic in goods and knowingly use counterfeit marks on and in connection with  
goods, to wit, 15 units of Microsoft Windows 98, by knowingly transporting,  
transferring, and disposing of them for \$525, in violation of Title 18, United States Code, Section  
2320(a).

SUPERSEDING INFORMATION  
[U.S. v. William Jin, et al., CR-02-20046 RMW]

1 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461(c) -  
2 Criminal Forfeiture)

3 2. The allegations contained in Count One of this Superseding Information are hereby  
4 realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture  
5 pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461(c).

6 3. As a result of the offense alleged in Counts One, the defendants  
7 WILLIAM JIN and PERRY ZHENG,  
8 shall forfeit to the United States all property, real or personal, involved in the offense and any  
9 property traceable thereto.

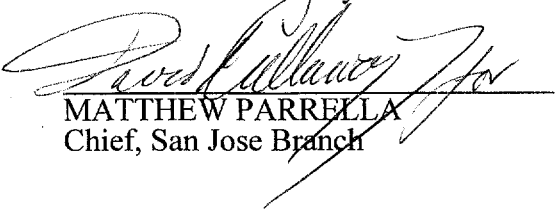
10 4. If any of the property described herein as being subject to forfeiture, as a result of any act  
11 or omission of the defendants-

- 12 (a) cannot be located upon the exercise of due diligence;  
13 (b) has been transferred or sold to or deposited with, a third person;  
14 (c) has been placed beyond the jurisdiction of the Court;  
15 (d) has been substantially diminished in value; or  
16 (e) has been commingled with other property which cannot be subdivided without  
17 difficulty;

18 any and all interest defendants have in other property shall be vested in the United States and  
19 forfeited to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461(c).

20 DATED: May 6, 2005

KEVIN V. RYAN  
United States Attorney

  
MATTHEW PARRELLA  
Chief, San Jose Branch

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25 Approved as to Form:

  
CHRISTOPHER P. SONDERBY  
Assistant United States Attorney